

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

HEALTH INSURANCE PLAN OF NEW  
YORK, et al.,

Plaintiff,

v.

AVENTIS PHARMACEUTICALS, INC.,

Defendant.

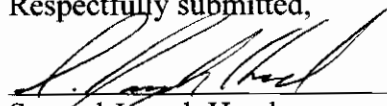
Civil Action No. 07-cv-6785 (HB)

**NOTICE OF MOTION FOR PRO HAC VICE ADMISSION**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Samuel Joseph Hand and the exhibits annexed thereto, Defendant Aventis Pharmaceuticals, Inc. will move this Court before the Honorable Harold Baer, United States District Judge, Southern District of New York, for an Order, in the form annexed hereto, granting the *pro hac vice* admission of Jonathan M. Bradley to act as counsel for Aventis Pharmaceuticals in this matter pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York. Mr. Bradley is an associate at Jones Day and resident in the Washington D.C. office of the firm, located at 51 Louisiana Avenue, NW, Washington D.C. 20001 (202)-879-3939.

Dated: November 26, 2007

Respectfully submitted,

  
Samuel Joseph Hand  
JONES DAY  
222 East 41st Street  
New York, New York 10017-6702  
Tel: 212-326-3939  
Fax: 212-755-7306

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**DECLARATION OF SAMUEL JOSEPH HAND IN SUPPORT OF MOTION FOR *PRO  
HAC VICE* ADMISSION OF JOHN M. BRADLEY**

Samuel Joseph Hand, pursuant to the provisions of 28 U.S.C. § 1746, states and declares as follows:

1. I am an associate at Jones Day, counsel for Defendant in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's application for an order granting John M. Bradley *pro hac vice* admission to this Court to participate in the above-captioned action, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in April 2005. I am also admitted to the bar of the United States District Court for the Southern District of New York and am in good standing with this court.
3. John M. Bradley is an associate at Jones Day and resident in the Washington D.C. office of the firm. He is of high moral character. He was admitted to practice before the courts of Commonwealth of Pennsylvania on October 31, 2005 and is currently in good standing. A

certificate of good standing issued by the Supreme Court of Pennsylvania, dated October 30, 2007, is annexed hereto as Exhibit A. He was admitted to practice before the District of Columbia Court of Appeals on June 12, 2006 and is currently a member in good standing. A Certificate of Good Standing issued by the District of Columbia Court of Appeals, dated November 6, 2007, is annexed hereto as Exhibit A.

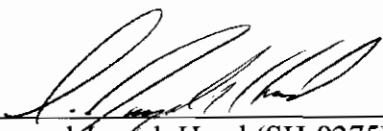
4. Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I request that John M. Bradley be permitted to appear *pro hac vice* for all purposes in connection with the above-captioned action.

7. Annexed hereto as Exhibit B is a proposed order granting this motion.

8. I declare under penalty of perjury that the foregoing is true and correct.

WHEREFORE, it is respectfully requested that this Court grant John M. Bradley *pro hac vice* admission to the bar of this Court for all purposes in connection with this case.

Dated: New York, New York  
November 26, 2007

  
\_\_\_\_\_  
Samuel Joseph Hand (SH-9275)

**EXHIBIT A**



**District of Columbia Court of Appeals**

**Committee on Admissions**

**500 Indiana Avenue, N.W. — Room 4200**

**Washington, D. C. 20001**

**202 / 879-2710**

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

JOHN M. BRADLEY

\_\_\_\_\_ was on the 12<sup>TH</sup> day of JUNE, 2006 \_\_\_\_\_  
duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on November 6, 2007.

GARLAND PINKSTON, JR., CLERK

By:   
Deputy Clerk



**Supreme Court of Pennsylvania**

October 30, 2007

**CERTIFICATE OF GOOD STANDING**

***John Michael Bradley, Esq.***

**DATE OF ADMISSION**

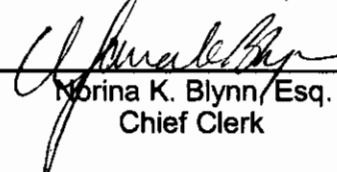
***October 31, 2005***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal**

**Dated: October 30, 2007**

  
Morina K. Blynn, Esq.  
Chief Clerk

**EXHIBIT B**

**UNITED STATES DISTRICT COURT  
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**ORDER FOR ADMISSION PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Defendant Aventis Pharmaceuticals, Inc. dated November 26, 2007, for an Order pursuant to Rule 1.3(c) of the Rules of the United States District Courts for the Southern and Eastern Districts of New York granting *pro hac vice* admission to John M. Bradley in connection with the above-captioned action, and upon consideration of the motion and declaration in support thereof, it is

**ORDERED** that John M. Bradley is granted *pro hac vice* admission to the bar of this Court for the purpose of participating in this action.

Dated: New York, New York  
\_\_\_\_\_, 2007

\_\_\_\_\_  
Honorable Harold Baer  
United States District Judge



**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Notice of Motion for Pro Hac Vice

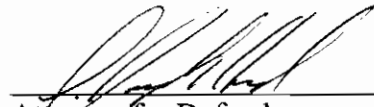
Admission was delivered by placing the same in first class mail on this 26<sup>th</sup> day of November,

2007 to:

Thomas M. Sobol  
HAGENS BERMAN SOBOL SHAPIRO LLP  
One Main Street, Fourth Floor  
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Mark M. Sandmann  
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Richard Cohen  
LOWEY DANNENBERG BEMPORAD SELINGER & COHEN, P.C.  
White Plains Plaza  
One North Broadway  
White Plains, NY 10601

  
\_\_\_\_\_  
Attorney for Defendant  
Aventis Pharmaceuticals, Inc.